

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

The Estate of Jon Leon Watson,
by and through its Administrator
Ad Prosequendum, Helen Ray Lloyd
and Helen Ray Lloyd, in her own
right,

Plaintiff,

Cumberland County, Warden Robert
Balicki, in his individual capacity
And John Doe Corrections Officers
1-10 (fictitious individuals) in
their individual capacities, &
CFG Health Systems, LLC

Defendants.

Case No. 1:16-CV-06578

NOTICE OF MOTION

TO: Holtzman & McClain, P.C.
Jeffrey S. McClain, Esquire

Weir & Partners
Dan Rybeck, Esquire

PLEASE TAKE NOTICE that Plaintiffs, by and through counsel, Conrad J. Benedetto, Esquire, will move before the Honorable Joseph H. Rodriguez, U.S.D.J. on March 1, 2021 for an Order as follows:

1. Granting Plaintiffs' Rule 60(b) Motion for Relief from Judgment Pursuant to Fed.R.Civ.P. 60(b); and
2. Request the Third Circuit Court of Appeals to Remand this matter to United State District Court, District of New Jersey; and
3. Vacate the Order of January 9, 2020 granting Summary Judgment in favor of Defendants, Cumberland County, Warden Balicki & CFG, and against Plaintiffs, the Estate of Jon Watson.

4. Such other relief the Court deems appropriate.

Plaintiffs will rely upon the Motion for Relief Pursuant to Fed.R.Civ.P. 60(b), Certification of Counsel, and Exhibit submitted herewith. A proposed form of Order is also submitted.

Oral argument is requested if opposition is filed.

LAW OFFICES OF CONRAD BENEDETTO

BY: *s/Conrad J. Benedetto*.

Conrad J. Benedetto, Esquire

Attorney I.D. No.: 013921981

1615 South Broad Street

Philadelphia, PA 19148

Phone No: (215) 389-1900

Fax No: (215) 271-8910

Email: benedettolegalassociates@gmail.com

Dated: February 1, 2021

cc. All Counsel via ECF

PROOF OF E-FILING AND SERVICE

I, Conrad J. Benedetto, Esquire, certify that the attached Motion for Relief from Judgment Pursuant to Fed.R.Civ.P. 60(b), Certification of Counsel and Exhibit have been filed with the Court and served on all parties of record through the Court's Electronic Case Filing System on February 1, 2021.

LAW OFFICES OF CONRAD BENEDETTO

BY: *s/Conrad J. Benedetto*.
Conrad J. Benedetto, Esquire